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Systems for Command, Control,
Communications, & Computers

DEPARTMENT OF THE ARMY
OFFICE OF THE SECRETARY OF THE ARMY
107 ARMY PENTAGON
WASHINGTON DC 20310-0107

SAIS-IIAC

6 March 2001

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Guidance for Implementation of Congressionally Mandated Requirements Concerning Access to Federal Information Technology by Members of the Public and Federal Employees with Disabilities (Section 508 of the Rehabilitation Act)

1. References.

- a. U.S. Access Board, Electronic and Information Technology Accessibility Standards, Economic Assessment, November 2000, <http://www.access-board.gov/news/508-final.htm>
- b. Federal Acquisition Regulation, Proposed Rule for Electronic and Information Technology Accessibility, Federal Register (66FR 7166) <http://www.section508.gov/docs/FARCase1999-607.htm>
- c. Memorandum for Chief Information Officers, Federal Chief Information Officers Council, subject: Publication of Final Regulations Implementing Section 508 dated December 21, 2000. <http://www.section508.gov/docs/ciomemo.html>
- d. Electronic and Information Technology Accessibility Standards, Architectural and Transportation Barriers Compliance Board, Federal Register, December 21, 2000, 36 CFR Part 1194, Docket No. 2000-01, RIN 3014-AA25, <http://www.access-board.gov/sec508/508standards.htm>

2. This memorandum directs your attention to above references that re-emphasize the importance of the 1998 amendments to Section 508 of the Rehabilitation Act requiring Federal electronic and information technology (EIT) be equally accessible to disabled and non-disabled Federal employees, and members of the public. These revisions do not replace any existing laws, and are additive to existing accessibility laws. All other statutes are still in force and still require "reasonable accommodation" of persons with disabilities. This memo provides guidance for two major areas impacted by the law--web page accessibility, and equipment and software accessibility.

3. The General Services Agency (GSA) and Department of Justice (DOJ) recommend that the first act of compliance be to assure that websites are accessible to persons with disabilities, for two reasons. First, websites are where the Government has the most interaction with the public, and secondly much progress has already been made in developing tools and techniques for website accessibility. Thus, the main focus of this memo is on website compliance with Section 508 requirements.

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4. Failure to meet Section 508 requirements can result in administrative claims and compliance suits against the Army. The effective date for compliance with the law is six months after publication by the Access Board of final standards. The Federal Register published the final standards on 21 December 2000, thus the compliance date is 21 June 2001. Standards can be seen at <http://www.access-board.gov/sec508/508standards.htm>, reference 1.d. This document is taken from the actual comment and response phase of the rulemaking process itself, and we recommend it as background reading for all involved personnel. Reference 1.b. is the proposed rule to incorporate these final standards in the Federal Acquisition Regulation (FAR). The rule is to be incorporated in the FAR within six months of the publication of the standards and will be the means by which contracting activities will incorporate the standards in EIT procurements. As you will note, the proposed rule is currently out for public comment (comments are to be submitted on or before March 23, 2001) and may, therefore, undergo some changes as a result of those comments.

5. EIT definitions for Section 508 are consistent with those in the Clinger-Cohen Act. EIT is defined as websites, desktop automation, copiers, faxes, printers, software systems (including legacy systems) telephone systems, and other similar EIT devices.

6. Exemption from Section 508 compliance exists for several areas. This includes EIT used for telecommunications or information systems, the function, operation, or use of which involves intelligence activities, cryptologic activities related to national security, command and control of military forces, equipment that is an integral part of a weapon or weapons system, and systems which are critical to the direct fulfillment of military or intelligence missions. However, it is possible that some classified websites may still require compliance for the benefit of *employees* with disabilities. Also exempt is the installed base of EIT prior to 21 June 2001, i.e., Section 508 is not retroactive, only forward looking.

7. Web page accessibility: Owners of all Army non-exempt websites (regardless of level or location, to include all MACOMs, Agencies, PAO's, PEO's, PM's, Reserve and National Guard) need to review their websites for accessibility and work towards compliance with the standards. The GSA Center for Information Technology Accommodation (CITA) provides Web guidelines and a list of resources. We request you use the guidance at <http://www.itpolicy.gsa.gov/CITA>, in conducting your reviews. A public domain site with tools useful in testing your site against these guidelines is at <http://www.w3.org/WAI/ER/existingtools.html>. Not all tools satisfy all requirements of the standard; thus webmasters may need to use a variety of tools, techniques, and common sense in achieving compliance. Web-based intranet and internet information and applications standards can be found at enclosure 1.

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8. Equipment/software accessibility: Section 508 requires EIT to comply with the standards for providing access for people with disabilities six months after their issuance. If you are planning to acquire EIT that can reasonably be expected to be used or accessed by non-disabled individuals, you need to make sure that your requirements documents incorporate language addressing the requirements for access and use by individuals with disabilities; (see reference 1.b. for the proposed rule to revise the FAR). You should also assure instructions are available that will assist individuals with disabilities in obtaining alternative EIT services. Because the new law permits members of the public and Army employees to file administrative claims or lawsuits for non-compliance, you should promptly coordinate any Section 508 complaint with your personnel and legal offices.

9. The DoD Computer/Electronic Accommodations Program (CAP) provides assistive technology and accommodations to persons with disabilities across the DoD, at no cost to individual activities. CAP's mission is to provide initial consultant assistance and to assure that people with disabilities have equal access to the information environment and opportunities in DoD, that is located at website www.tricare.osd.mil/cap. CAP supports electronic accessibility efforts, including Section 508 requirements and provides demonstrations and evaluations of assistive technology. The CAP point of contact is Ms. Dinah F.B. Cohen, Director who can be reached at: Dinah.Cohen@tma.osd.mil .

10. Because of the sweep of this new law and the newness of the standards, this guidance is necessarily general in nature. Addressees are cautioned that taskings on Section 508 will be forwarded only from OSD through ODISC4 to the Army, e.g., the DOJ bi-ennial survey, which was widely mentioned on various sites, will only apply to selected Army web sites. Guidance from OSD on the DOJ survey is expected soon, at which time ODISC4 will task the appropriate Army sites. The Army has been a leader in ensuring access to Information Technology resources for both disabled members of the public and to Army employees. We need to continue this progress with a planned, uniform implementation of Section 508 standards. The POC for Section 508 is Mr. Bill Ryan, commercial 703-428-1240, DSN 328-1240, william.ryan@hqda.army.mil, or Ms. Shirley Bayne, commercial 703-428-1242, DSN 328-1242, shirley.bayne@hqda.army.mil.



Encl
as

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SECTION 508 STANDARDS

36 CFR 1194.22 Web-based intranet and internet information and applications.

- (a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).
- (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.
- (d) Documents shall be organized so they are readable without requiring an associated style sheet.
- (e) Redundant text links shall be provided for each active region of a server-side image map.
- (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.
- (g) Row and column headers shall be identified for data tables.
- (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- (i) Frames shall be titled with text that facilitates frame identification and navigation.
- (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.
- (l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.
- (m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).
- (n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.
- (o) A method shall be provided that permits users to skip repetitive navigation links.

Enclosure 1